

Edward B. Schwartz  
202 429 6220  
eschwartz@step toe.com



1330 Connecticut Avenue, NW  
Washington, DC 20036-1795  
202 429 3000 main  
[www.steptoec.com](http://www.steptoec.com)

November 27, 2017

Donna Curling (dcurling0531@gmail.com)

Ricardo Davis (ricardodavis@gaconstitutionparty.org)

Laura Digges (lmdigges@gmail.com)

William Digges, III (wdigges@gmail.com)

Donna Price (donna**price**studio@gmail.com)

Jeffrey Schoenberg (schoenbergjhe@gmail.com)

Edward Curtis Terry (ted.terry.mayor@gmail.com)

Re: **Notice of Withdrawal from *Curling v. Kemp*, 1:17-cv-02989-AT**

Dear all:

As you know, Steptoe & Johnson LLP represented jointly each of the plaintiffs in *Curling v. Kemp*, Case No. 1:17-cv-02989-AT (N.D. Ga.) (“Case”). As you also know, on November 3, 2017, we moved to withdraw from the representation of one of the plaintiffs, Coalition for Good Governance (“CGG”) because, among other things, we could no longer work constructively with Marilyn Marks, the Executive Director of CGG, and because the objectives of CGG and other plaintiffs differ. On behalf of CGG, Ms. Marks has declined to consent to our continuing representation of the remaining plaintiffs in the action. Therefore, under applicable Georgia rules, we intend to withdraw from the representation of all plaintiffs.

This letter provides you the detailed notice of withdrawal under Local Rule 83.1(E).

\_\_\_\_\_ we provide you here with all of the information referenced under Local Rule 83.1(E). We will file a withdrawal motion on December 14, 2017, if not substituted before then.

██████████ the Case is pending before Judge Totenberg and her clerk is Amy McConochie, who can be reached at (404) 215-1437, in the Richard B. Russell Federal Building,

Plaintiffs  
November 27, 2017  
Page 2



2211 United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3309. [REDACTED]

[REDACTED] opposing counsel in this Case are:

**Roy E. Barnes**

Barnes Law Group, LLC  
31 Atlanta Street  
Marietta, GA 30060  
770-227-6375

**John F. Salter**

Barnes Law Group, LLC  
31 Atlanta Street  
Marietta, GA 30060  
770-227-6375

**Robert Sparks Highsmith, Jr.**

Holland & Knight LLP  
1180 W. Peachtree Street NW  
Suite 1800  
Atlanta, GA 30309  
404-898-8012

**Cheryl Ringer**

Office of Fulton County Attorney  
Fulton County Government Center  
141 Pryor Street, S.W.  
Suite 4038  
Atlanta, GA 30303  
404-612-0263

**David R. Lowman**

Fulton County Attorney's Office  
141 Pryor Street, SW  
Suite 4038  
Atlanta, GA 30303  
404-612-0246

**Kaye Woodard Burwell**

Office of the Fulton County Attorney  
Suite 4038  
141 Pryor Street, S.W.  
Atlanta, GA 30303  
404-612-0262

**Bennett Davis Bryan**

DeKalb County District Attorney's Office  
Assistant County Attorney  
5th Floor  
1300 Commerce Drive  
Decatur, GA 30030  
404-371-3011

**Daniel Walter White**

Haynie Litchfield Crane & White  
222 Washington Avenue  
Marietta, GA 30060  
770-422-8900

**Anne Ware Lewis**

Strickland Brockington Lewis, LLP  
1170 Peachtree Street, NE  
Suite 2200, Midtown Proseium  
Atlanta, GA 30309-7200  
678-347-2200

**Barclay Hendrix**

Strickland Brockington Lewis, LLP  
1170 Peachtree Street, NE  
Suite 2200, Midtown Proseium  
Atlanta, GA 30309-7200  
678-374-2200

Plaintiffs  
November 27, 2017  
Page 3



**Frank B. Strickland**  
Strickland Brockington Lewis, LLP  
1170 Peachtree Street, NE  
Suite 2200, Midtown Proseium  
Atlanta, GA 30309-7200  
678-347-2200

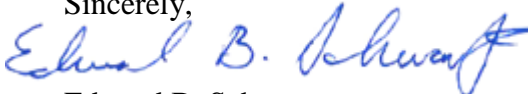
**Vincent Robert Russo, Jr.**  
Robbins Ross Alloy Belinfante Littlefield,  
LLC -Atl  
Suite 1120  
999 Peachtree Street, N.E.  
Atlanta, GA 30309  
404-856-3260

The Case is pending and will remain in the United States District Court for the Northern District of Georgia, Atlanta Division after the termination of Steptoe's relationship with the plaintiffs.

██  
You have the burden of keeping the court informed respecting where notices, pleadings, or other papers may be served—whether to Holcomb + Ward, another counsel, or both. You also have the obligation to prepare for trial or have counsel to prepare for trial. If you fail or refuse to meet these burdens, you may suffer adverse consequences. The deadline for the close of all discovery in this case is January 20, 2018.<sup>1</sup>

Upon our withdrawal, to the extent that you do not want to receive service through counsel Holcomb + Ward or if Holcomb + Ward no longer serves as your counsel and no other counsel represents you, then we will advise that service of notices may be made upon you. ██████████  
██████████ under the Local Rules, if you are a corporation, corporations may only be represented in court by an attorney. An attorney must sign all pleadings submitted to the court and a corporate officer may not represent the corporation in court unless that officer is also an attorney licensed to practice law in Georgia. Failure to comply with this rule could result in a default being entered against the corporate party.

██  
██  
██

Sincerely,  
  
Edward B. Schwartz

cc: Holcomb + Ward  
CGG

---

<sup>1</sup> The court has not entered a scheduling order in this case, but Judge Totenberg set January 20, 2018 as the discovery deadline during a telephonic conference.